

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
RAMON OLIVIO,	:	VIOLATIONS:
a/k/a “Jose Elias-Sobrado,”	:	21 U.S.C. § 846 (conspiracy to possess
a/k/a “Ramon Manazilla-	:	with intent to distribute heroin - 1 count)
Rodriguez,”	:	21 U.S.C. § 841(a)(1) (possession with
ANDRES GONZALEZ,	:	intent to distribute heroin - 1 count)
a/k/a “El Medico”	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From at least on or about June 16, 2007, through on or about June 22, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants,

RAMON OLIVIO,
a/k/a “Jose Elias-Sobrado,”
a/k/a “Ramon Manazilla-Rodriguez,”and
ANDRES GONZALEZ,
a/k/a “El Medico,”

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

2. It was part of the conspiracy that: Defendant RAMON OLIVIO approached Confidential Source (CI) #1 about purchasing approximately five kilograms of heroin.

3. On behalf of defendant of RAMON OLIVIO's "investor," defendant ANDRES GONZALEZ, defendant RAMON OLIVIO negotiated the purchase of approximately three kilograms of heroin from CS #2, whom defendant OLIVIO believed to be a Colombian supplier of heroin and cocaine.

4. Defendants RAMON OLIVIO and ANDRES GONZALEZ met with CS #1 and #2 to obtain heroin and took delivery of approximately three kilograms of a mixture or substance containing a detectable amount of heroin in exchange for \$30,000 and an agreement by CS #1 and #2 to pay additional monies once the heroin was sold by defendant GONZALEZ and others.

OVERT ACTS

In furtherance of the conspiracy defendants RAMON OLIVIO and ANDRES GONZALEZ committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about June 16, 2007, defendant RAMON OLIVIO contacted CS #1 and inquired about purchasing multiple kilograms of heroin from CS #1's Colombian drug supplier.

2. On or about June 18, 2007, defendant RAMON OLIVIO contacted CS #2 and stated that he had investors who wanted to purchase five kilograms of heroin from CS #2's next shipment of heroin.

3. On or about June 22, 2007, defendant RAMON OLIVIO met with CS #2 to negotiate the purchase of three kilograms of heroin for a total of \$30,000.

4. On or about June 22, 2007, defendant RAMON OLIVIO introduced defendant ANDRES GONZALEZ to CS #1 and CS #2. At the time of the meeting, defendant GONZALEZ gave CS #2 \$30,000 in exchange for approximately three kilograms of a mixture of substance containing a detectable amount of heroin.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendants,

**RAMON OLIVIO,
a/k/a “Jose Elias-Sobrado,”
a/k/a “Ramon Manazilla-Rodriguez,” and
ANDRES GONZALEZ,
a/k/a “El Medico,”**

knowingly and intentionally possessed with the intent to distribute one kilogram or more of a
mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

NOTICE OF CRIMINAL FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section 846 and 841(a)(1), set forth in this indictment, defendants,

**RAMON OLIVIO,
a/k/a “Jose Elias-Sobrado,”
a/k/a “Ramon Manazilla-Rodriguez,”and
ANDRES GONZALEZ,
a/k/a “El Medico,”**

shall forfeit to the United States:

(a) Any property constituting, or derived from, proceeds obtained as the result of such violations, and,

(b) Any property used, or intended to be used, to commit, or to facilitate the commission of such violations, including, but not limited to the following:

(1) Approximately \$169,137, and any other monies received as a result of the distribution of heroin.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY